

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Matt V. Smith  
Laurel L. Sassi

Debtors

Matt V. Smith  
Laurel L. Sassi

Movants

vs.

Freedom Mortgage Corporation

Respondent

NO. 18-23249-CMB

CHAPTER 13

Related to Docs. 49, 60

Hearing Date: 8/5/20 @ 10:00 a.m.

**STIPULATION AND ORDER**

AND NOW, come the undersigned parties, by and through their respective counsel, and enter into the following Stipulation:

WHEREAS, Debtors filed an objection to the Respondent's Notice of Mortgage Payment Change filed November 8, 2019 at Claim No. 9-1, which increased Debtors' monthly payment from \$571.04 to \$720.19 effective December 1, 2019;

WHEREAS, the monthly payment increase was due to an increase in the escrow payment from \$149.43 to \$298.58 per month;

WHEREAS, the escrow payment included payment of forced place insurance;

WHEREAS, Debtors have since purchased homeowners insurance;

WHEREAS, Respondent has issued an Escrow Account Disclosure Statement dated June 8, 2020 to address changes in Debtors' monthly payment.

It is therefore Stipulated and agreed as follows:

1. Debtors' monthly payment will be \$590.66 effective August 1, 2020, as evidenced by the Escrow Account Disclosure Statement dated June 8, 2020 which is attached hereto as Exhibit "A".
2. As stated in the Escrow Account Disclosure Statement, there is an escrow surplus of \$692.23, which surplus shall be mailed to the Debtors.
3. Debtors acknowledge that future annual escrow reviews may require increases in the amounts owed for escrow items and escrow shortages, resulting in corresponding increases in monthly payments.
4. Debtors' Objection to the Notice of Mortgage Payment Change is hereby withdrawn.
7. The hearing scheduled for August 5, 2020 at 10:00 a.m. is cancelled.

Consented to by:



Mark A. Rowan, Esquire  
Attorney for Debtors  
890 Vanderbilt Road  
Connellsville, PA 15425  
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Markrowan1@verizon.net



~~/s/ James C. Warmbrodt, Esquire~~

~~James C. Warmbrodt, Esquire~~

KML Law Group, P.C.  
Attorney for Respondent  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
Phone: 412-430-3594

~~j.warmbrodt@kmlawgroup.com~~

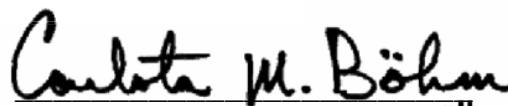
Brian C. Nicholas, Esq.  
bnicholas@kmlawgroup.com

It is hereby ORDERED that the parties' Stipulation be and hereby is APPROVED.

It is FURTHER ORDERED that the Continued Telephonic Hearing scheduled for September 16, 2020, at 10:00 a.m. is CANCELLED.

FILED  
9/15/20 2:47 pm  
CLERK  
U.S. BANKRUPTCY  
COURT - WDPA

By the Court,



Carlota M. Böhm glb  
Chief United States Bankruptcy Judge

Certificate of Notice Page 3 of 3  
United States Bankruptcy Court  
Western District of Pennsylvania

In re:  
Matt V. Smith  
Laurel L. Sassi  
Debtors

Case No. 18-23249-CMB  
Chapter 13

**CERTIFICATE OF NOTICE**

District/off: 0315-2

User: gamr  
Form ID: pdf900

Page 1 of 1  
Total Noticed: 1

Date Rcvd: Sep 15, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 17, 2020.  
db/jdb Matt V. Smith, Laurel L. Sassi, 201 Republic Road, Republic, PA 15475

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
NONE. TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS \*\*\*\*\*

NONE. TOTAL: 0

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Sep 17, 2020

Signature: /s/Joseph Speetjens

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**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 15, 2020 at the address(es) listed below:

Brian Nicholas on behalf of Creditor Freedom Mortgage Corporation bnicholas@kmlawgroup.com  
James Warmbrodt on behalf of Creditor Freedom Mortgage Corporation bkgroup@kmlawgroup.com  
Jerome B. Blank on behalf of Creditor Freedom Mortgage Corporation pawb@fedphe.com  
Jill Manuel-Coughlin on behalf of Creditor PENNYMAC LOAN SERVICES, LLC  
bankruptcy@powerskirn.com  
Mark A. Rowan on behalf of Joint Debtor Laurel L. Sassi markrowanl@verizon.net  
Mark A. Rowan on behalf of Debtor Matt V. Smith markrowanl@verizon.net  
Office of the United States Trustee ustpregion03.pi.ecf@usdoj.gov  
Ronda J. Winnecour cmecf@chapter13trusteedpa.com

TOTAL: 8